IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

H.J. HEINZ COMPANY
1 PPG Place, Suite 3100
Pittsburgh PA 15222,

Plaintiff

vs.

BOULDER BRANDS USA, INC.
formerly known as GFA BRANDS, INC.
1600 Pearl Street
Boulder CO 80302

c/o National Corporate Research, Ltd.
615 S. Dupont Hwy
Dover DE 19901,

Defendant.

Civil Action No. 2:15-cv-681-LPL

JOINT MOTION TO ENTER RULE 502(d) ORDER

Pursuant to the Rule 26(f) Report entered in this proceeding, Plaintiff H.J. Heinz Company ("Heinz") and Defendant Boulder Brands USA, Inc. ("Boulder Brands") respectfully jointly move this Court to enter a formal Order under Rule 502(d) of the Federal Rules of Civil Procedure governing electronic discovery. The proposed Order is attached hereto as Exhibit A.

Dated: November 6, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed, is available for viewing and downloading from the ECF system, and was sent to all counsel of record on November 6, 2015.

DINSMORE & SHOHL LLP

/s/April L. Besl

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